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Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ALEJANDRO SANDOVAL,
aka "Squeaky,"

16 Defendant.
17
18

No. CR 18-774 (A)-JAK-3

GOVERNMENT'S PROPOSED VOIR DIRE

Trial Date: June 7, 2022
Time: 8:30 A.M.
Location: Courtroom of the
Hon. John A.
Kronstadt

19 Pursuant to Federal Rule of Criminal Procedure 24(a)(2)(B),
20 plaintiff United States of America, by and through its counsel of
21 record, the United States Attorney for the Central District of
22 California and Assistant United States Attorney Shawn T. Andrews,

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1 respectfully requests that the Court ask prospective jurors the
2 attached questions during voir dire, in addition to the Court's
3 standard voir dire questions.

4 Dated: May 16, 2022

Respectfully submitted,

5 TRACY L. WILKISON
6 United States Attorney

7 SCOTT M. GARRINGER
8 Assistant United States Attorney
9 Chief, Criminal Division

10 /s/
SHAWN T. ANDREWS
Assistant United States Attorney

11 Attorneys for Plaintiff
12 UNITED STATES OF AMERICA
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GOVERNMENT'S PROPOSED VOIR DIRE

I. PRIOR EXPERIENCE WITH CRIMINAL CASES/LAW ENFORCEMENT

1. Have you or anyone close to you ever been involved in a criminal case as a victim, a defendant, or a witness?

a. What type of case was it?

b. What was your relationship to that case?

c. When did the case take place?

d. Where did the case take place?

e. Was anyone arrested?

f. Which law enforcement agency was involved?

2. Have you or any close to you ever had a negative experience with the police, the FBI, or any member of law enforcement?

a. Who had the experience?

b. What was the experience?

c. When was the experience?

d. Which law enforcement agency was involved?

e. Do you have any feelings or beliefs - either positive or negative - about law enforcement based on that experience?

f. Do you have any feelings or beliefs - either positive or negative - about the criminal justice system based on that experience?

g. Is there anything about your experience that would prevent you from being a fair and impartial juror?

3. Have you or anyone close to you ever filed a lawsuit or a complaint concerning the conduct of the police, the FBI, or a law enforcement officer?

1 4. Have you or anyone close to you ever been accused,
2 arrested, indicted, charged, or convicted in a criminal case (this
3 excludes infractions such as traffic offenses)?

4 a. What type of case was it?

5 b. When was the case?

6 c. What was the accusation/charge?

7 d. What was the outcome?

8 5. Do you have any personal feelings or beliefs about the
9 police, the FBI, or law enforcement officers that would prevent you
10 from making a fair assessment about the testimony of the law
11 enforcement officers who will testify in this case?

12 6. Do you have any personal feelings or beliefs about the
13 criminal justice system that would prevent you from reaching a fair
14 and impartial verdict in this case?

15 **II. GENERAL ABILITY TO SERVE AS A JUROR ON THIS CASE**

16 7. If you are selected as a juror and hear this case, you will
17 be required to deliberate with other jurors. This will require you
18 to discuss the evidence and the law in this case with your other
19 jurors. Is there anything in your experience that leads you to
20 believe that you would be unable or unwilling to engage in such
21 discussions?

22 8. The potential punishment for the offenses charged in the
23 indictment is a matter that can never be considered by a jury in
24 arriving at an impartial verdict as to the guilt or innocence of an
25 accused. Will each of you be able to conduct your duties as jurors
26 in this case without speculating about or being influenced in any way
27 by whatever punishment may or may not be imposed in this case?

1 9. Some people who, for moral, ethical, or religious reasons,
2 may find it difficult or uncomfortable to pass judgment on the
3 conduct of others. Is there anyone who holds such beliefs, or who
4 might be affected by such beliefs?

5 10. Is there anything about the charges in this case that makes
6 you think you could not be a fair and impartial juror in this case?